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STIPULATED MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANT'S ANSWER TO SECOND AMENDED COMPLAINT, AFFIRMATIVE DEFENSES AND COUNTERCLAIM - 1

CASE NO.: 2:15-CV-00366-JLR

HONORABLE JAMES L. ROBART

UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON (SEATTLE)

INTELLICHECK MOBILISA, INC.,

Plaintiff,

v.

HONEYWELL INTERNATIONAL, INC.,

Defendant.

NO. No. 2:16-cy-00341JRL

STIPULATED MOTION-tand AND PROPOSED ORDER FOR EXTENSION OF TIME TO RESPOND TO COUNTERCLAIM

NOTE ON MOTION CALENDAR: SAME DAY

Pursuant to Local Civil Rule 7(d)(1), Plaintiff, INTELLICHECK MOBILISA, INC. ("INTELLICHECK"), and Defendant, HONEYWELL INTERNATIONAL, INC. ("HONEYWELL") hereby stipulate and respectfully move this Court for an Order extending the response date for which Plaintiff must respond to Defendants' Answer to Second Amended Complaint, Affirmative Defenses and Counterclaims (Dkt. 94) until and including January 12, 2018.

In support of this motion, the parties agree that there is good cause to extend the response date to the Counterclaims in that currently a response to Defendant's Answer to Second Amended Complaint, Affirmative Defenses and Counterclaims (Dkt. 94) is due on December 26, 2017. Counsel for Plaintiff will be out of the office for the Christmas holidays and is therefore in need of additional time to properly respond. The parties therefore respectfully request the Court to extend the response date to the Counterclaims until and including January 12, 2018.

BEUSSE WOLTER SANKS & MAIRE, PLLC 390 North Orange Avenue, Suite 2500

Orlando, FL 32801 Tel: 407-926-7700 Fax: 407-926-7720

1 IT IS SO STIPULATED. 2 DATED this 18th day of December, 2017 3 DAVIS WRIGHT TREMAINE LLP QUARLES & BRADY, LLP 4 By: s/Benjamin J. Byer By: s/ David R. Yohannan David R. Yohannan, Pro Hac Vice 5 Benjamin J. Byer, WSBA #38206 Nikia L. Gray, Pro Hac Vice 1201 Third Avenue 6 1701 Pennsylvania Avenue NW, Suite 700 **Suite 2200** Washington, D.C. 20006 Seattle, WA 98101-3045 7 Tel: 202-780-2637 Tel: 206-747-8105 Fax: 206-757-7700 Fax: 202-372-9599 8 Email: dyohannan@quarles.com Email: benbyer@dwt.com Email: nikia.gray@quarles.com 9 BEUSSE WOLTER SANKS GORDON & REES LLP 10 Richard P. Sybert, WSBA #8357 & MAIRE, PLLC Brandon R. Carroll, WSBA #39510 11 Sean D. Flaherty, Admitted Pro Hac Vice By: s/Amber N. Davis 701 Fifth Avenue, Suite 2100 12 Amber N. Davis, Pro Hac Vice Seattle, WA 98104 Terry M. Sanks, Pro Hac Vice 13 Tel: 206-695-5100 390 North Orange Avenue, Suite 2500 Fax: 206-689-2822 Orlando, Florida 32801 14 Email: rsybert@gordonrees.com Telephone: (407) 926-7716 Email: brcarroll@gordonrees.com Facsimile: (407) 926-7720 15 Email: sflaherty@gordonrees.com E-mail: adavis@bwsmiplaw.com 16 E-mail: tsanks@bwsmiplawfl.com GORDON & REES LLP David W. Cramer, WSBA #49566 17 Attorneys for Plaintiff 121 SW Morrison, Suite 1575 Intellicheck Mobilisa, Inc. Portland, OR 97204 18 Tel: 503-382-3844 19 Fax: 503-616-3600 Email: dcramer@grsm.com 20 GORDON REES SCULLY MANSUKHANI 21 Reid E. Dammann, Pro Hac Vice 633 West Fifth Street, 52nd Floor 22 Los Angeles, CA 90071 Tel: 213-576-5000 23 Email: rdammann@grsm.com 24 Attorneys for Defendant HONEYWELL INTERNATIONAL, INC. 25 26

STIPULATED MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANT'S ANSWER TO SECOND AMENDED COMPLAINT, AFFIRMATIVE DEFENSES AND COUNTERCLAIM

CASE NO.: 2:15-CV-00366-JLR

BEUSSE WOLTER SANKS & MAIRE, PLLC 390 North Orange Avenue, Suite 2500

Orlando, FL 32801 Tel: 407-926-7700 Fax: 407-926-7720

1	TPROPOSEDI-ORDER \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \ \
2	It is so ordered.
3	DATED this 18 day of <u>Docon her</u> 2017.
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5	THE POLICE PLANTS POPLET
6	THE HONORABLE JAMES L. ROBART ` UNITED STAITES DISTRICT JUDGE
7	CERTIFICATE OF SERVICE
8	I HEREBY CERTIFY that on the 18th day of December, 2017, I electronically filed the
9	
10	foregoing with the Clerk of the Court using the CM/ECF system which will send notification of
11	such file to the following:
12	David R. Yohannan, Admitted <i>pro hac vice</i> U.S. Mail
13	Joseph D. Wilson, Admitted pro hac vice QUARLES & BRADY, LLP Hand Delivery Overnight Mail
14	1701 Pennsylvania Avenue NW, Suite 700Facsimile
15	Washington, D.C. 20006 X CM/ECF Email: dyohannan@kelleydrye.com
16	Email: jwilson@kelleydrye.com
17	Richard P. Sybert, WSBA #8357U.S. Mail Brandon R. Carroll, WSBA #39510Hand Delivery
18	Sean D. Flaherty, Admitted <i>Pro Hac Vice</i> GORDON & REES LLP Overnight Mail Facsimile
19	701 Fifth Avenue, Suite 2100 Seattle, WA 98104 ZM/ECF
20	Email: rsybert@gordonrees.com
21	Email: brcarroll@gordonrees.com Email: sflaherty@gordonrees.com
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STIPULATED MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANT'S ANSWER TO SECOND AMENDED COMPLAINT, AFFIRMATIVE DEFENSES AND COUNTERCLAIM

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1 2 3 4 5 6 7	GORDON & REES LLP David W. Cramer, WSBA #49566 121 SW Morrison, Suite 1575 Portland, OR 97204 Tel: 503-382-3844 Facsimile Fax: 503-616-3600 Email: dcramer@grsm.com GORDON REES SCULLY MANSUKHANI Reid E. Dammann, Pro Hac Vice 633 West Fifth Street, 52 nd Floor Los Angeles, CA 90071 U.S. Mail Hand Delivery Overnight Mail
8	Tel: 213-576-5000 Facsimile Email: rdammann@grsm.com X CM/ECF
9	Attorneys for Defendant
10	HONEYWELL INTERNATIONAL, INC.
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13	<u>s/ Amber N. Davis</u> Amber N. Davis
14	Annoci IV. Davis
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1	STIPULATED MOTION FOR EXTENSION OF TIME TO RESPOND TO DEFENDANT'S ANSWER TO SECOND AMENDED COMPLAINT, AFFIRMATIVE DEFENSES AND COUNTERCLAIM Orlando, FL 32801 BEUSSE WOLTER SANKS & MAIRE, PLLC 390 North Orange Avenue, Suite 2500 Orlando, FL 32801

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